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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

MR.DERRICK VERNON COLE
7116 PINEDALE AVE
LAS VEGAS, NEVADA 89145
702-233-4633 PHONE NUMBER
PLAINTIFF IS IN PRO/PER

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEVADA
LAS VEGAS

DERRICK VERNON COLE

2:16-cv-02487-JCM-NJK

PLAINTIFF,

VS

ALLIED INTERSTATE LLC &
EDUCATIONAL CREDIT MANAGEMENT
CORPORATION Does 1 through 15,
SOUTHERN CALIFORNIA EDISON
Does 16 through 21,
AD ASTRA RECOVERY SERVICE &
SPEEDY CASH Does 22 through 26,
I.C. SYSTEMS & COX
COMMUNICATIONS
Does 27 through 32,
ALLIED COLLECTION SERVICE &
EDWIN ADOLFO MD
Does 33 through 36,
FINANCIAL CREDIT NETWORK &
SOUTHERN CALIFORNIA GAS
Does 37 through 42.

DEFENDENTS ET.AL

)
) *THE CAUSE OF ACTION AGAINST*
) *DEFENDANT 1 (AI-LLC/ECMC) IS UNFAIR*
) *PRACTICES TITLE 15 U.S. CODE §1692(F).*
)
) *THE CAUSE OF ACTION AGAINST*
) *DEFENDANT 2 (SO CAL EDISON) IS*
) *REPORTING OBSOLETE CREDIT*
) *INFORMATION 15 U.S.CODE §1681C.*
)
) *THE CAUSE OF ACTION AGAINST*
) *DEFENDANT 3 (AARS/SC) IS UNFAIR*
) *PRACTICES TITLE 15 U.S.CODE §1692(F).*
)
) *THE CAUSE OF ACTION AGAINST*
) *DEFENDANT 4 (I.C. SYSTEMS & COX*
) *COMMUNICATION IS TITLE 15 U.S CODE*
) *§1692(F) UNFAIR PRACTICES.*
)
) *THE CAUSE OF ACTION AGAINST*
) *DEFENDANT 5 (ACS& DR.ERIN A M.D.)*
) *IS TITLE 15 U.S CODE §1692(F) UNFAIR*
) *PRACTICES.*
)
) *THE CAUSE OF ACTION AGAINST*
) *DEFENDANT 6 (FCN&SCG) IS TITLE 15*
) *U.S.CODE §1681 RPTR OBSO CREDIT INFO.*

TRIAL BY JUDGE

COMPLAINT FOR DAMAGES 1

INTRODUCTION OF PLAINTIFF & DEFENDANTS

(Plaintiff) Derrick Vernon Cole, is a (Disabled/Student) and located at the address 7116 Pinedale Ave, Las Vegas, Nevada 89145. (702) 233-4633. (Plaintiff Derrick Vernon Cole) files this ("Civil Complaint") for damages against these Defendants listed in caption for material allegations with evidence of damage pursuant to the rules and regulations of the (Fair Debt Collection Practice Act) Title 15 of the United States Annotated Code§1692 and additional codes covered in this (Civil Complaint). This civil complaint is filed pursuant to all applicable Federal Codes of Civil Procedure and Rules Of The Court that can be adjudicated to this case during the course of litigation upon approval of the court.

THE DEFENDANTS

Defendant 1.) The (Collection Agency) (DBA) doing business as (**Allied Interstate L.L.C**) and is located at Post Office Box 361445 Columbus, Ohio 43236. (800) 881- 4214. This (Collection Agency) represents the (Original Creditor) known as a (Student Loan Service) (DBA) doing business as (**Educational Credit Management Corporation**). This business is located at 111 South Washington Ave Suite 1400 Minneapolis, Minnesota 55401. (651)-221-0566.

Defendant 2.) The (Utility Company) and (Original Creditor) (DBA) doing business as (**Southern California Edison**) and is located at Post Office Box 600 Rosemead, California 91770. 1-800-950-2356. This company is self-represented.

1 **Defendant 3.)** The (Collection Agency) (DBA) doing business as (**AD-Astra**
2 **Recovery Services Inc.**), located at 7330 West 33rd Street N, Wichita, Kansas 67205
3 (866-398-2089). This (Collection Agency) represents the (Original Creditor)
4 (**Payday Loan Co**) (DBA) doing business as (**Speedy Cash 29**) who is located at 270
5 East Base Line Street, San Bernardino 92410 (909) 885-3369.
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8 **Defendant 4.)** The (Collection Agency) (DBA) doing business as (**L.C. SYSTEMS**)
9 located at Post Office Box 64378 Saint Paul Minnesota 55164. This (Collection
10 Agency) represents the (Original Creditor) (DBA) (**COX COMMUNICATIONS**)
11 located at 6205 B Peachtree Dunwoody Road NE Atlanta, Georgia 30328.
12

13 **Defendant 5.)** The (Collection Agency) (DBA) doing business as (**Allied Collection**
14 **Services Co**) who is located at 3080 South Durango Drive Suite #208 Las Vegas,
15 Nevada 89117. This (Collection Agency) represents the (Original Creditor) the
16 (Medical Doctor) with the name (**Edwin Adolfo M.D.**) located at 3186 South
17 Maryland Parkway Las Vegas, Nevada 89109.
18

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20 **Defendant 6.)** The (Collection Agency) (DBA) doing business as the (**Financial**
21 **Credit Network**) 1300 West Main Street Visalia, California 93291. This (Collection
22 Agency) represents the (Original Creditor) (DBA) (**Southern California Gas**
23 **Company**) located at Centralized Correspondence Post Office 3150 San Dimas,
24 California 91773.
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DEFENDANT ONE (1)

STATEMENT OF FACTS AND CAUSE OF ACTION FOR THE DEFENDANTS
(DBA) ALLIED INTERSTATE LLC & EDUCATIONAL CREDIT
MANAGEMENT CORPORATION
UNFAIR PRACTICES OF TITLE 15 U.S.C.A §1692(F)

1) ("Plaintiff Derrick Vernon Cole") is ignorant of true names of this Business and Corporation and their capacities. The Defendants listed in caption as a (Collection Agency) (DBA) (ALLIED INTERSTATE LLC) who represents the (Original Creditor (EDUCATIONAL CREDIT MANAGEMENT CORPORATION) and Does 1 through 15, in this ("Civil Complaint") is sued.

2) The Defendants named above with their fictitious (Corporation) and (Business) names are sued in this ("Civil Complaint"). (Plaintiff Derrick Vernon Cole) will amend this ("Civil Complaint") and allege the true names of any unknown ("Defendant(s) or ("Associate(s) and their true names in his or her own capacity when that information is ascertained and filed in accordance with Federal Civil pleading procedures.

3) ("Plaintiff Derrick Vernon Cole") believes and alleges the Defendants (ALLIED INTERSTATE LLC) the (Collection Agency) and the (Original Creditor) (EDUCATIONAL CREDIT MANAGEMENT CORPORATION) was and still is negligent and responsible for the violations of the (FDCPA) ("Fair Debt Collection Practice Act") pursuant to Title 15 U.S.C.A §1692(F) Unfair Practices.

1 4) The (Defendants ECMC) received payments from ("Plaintiff Derrick V Cole")
2 and did not give him credit for it. ("Plaintiff Derrick V Cole") has 3 different
3 (PIF- paid in full) notices for the balances of \$4,000.00 and the amount \$2,625.00
4 with the dates of 11/07/2012, and prior 10/10/2012 these loans are paid in full. The
5 Defendants ("ECMC Education Credit Management Corporation") issued a wage
6 garnishment on ("Plaintiff Derrick Vernon Cole's") Social Security Disability
7 benefits in year(s) 2009, 2010, 2011, 2012 and direct payments were made by
8 (Plaintiff Cole) in the year of 2012 out of his pocket in the amount of \$500.00.
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12 5) ("Plaintiff Derrick V Cole") has the original ("Department Of Treasury") notices
13 proving the wage assignment/garnishment the business ("ECMC- Educational Credit
14 Management Corporation") did not petition the Court for nor did they have a Court
15 Order. Hereof, through some unknown procedure the Defendants received monies
16 from the IRS during the wage garnishment from the U.S. Treasury. (Plaintiff Cole)
17 was not informed that (ECMC) business had an order to take every single dime
18 ("Plaintiff Cole") had as income and that is just what they did.
19
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22 6) This Defendant (ECMC -Education Credit Management Corporation) not only
23 collected money from the (U.S. Treasury) through a wage assignment they solicited
24 the (IRS) Internal Revenue Service for any income that Plaintiff Cole was to receive.
25

26 7) ("Plaintiff Derrick V Cole") is a (Victim) of ("ID Theft") on both ("Federal And
27 State Tax") levels. (Plaintiff Cole's) first (Exhibit A) for this (Defendant) is the (IRS
28 Theft Notice) qualifying Plaintiff Cole as a (Victim) of ("ID Theft").

1 8) The Defendant (ECMC -Education Credit Management Corporation) collected
2 payments from ("Plaintiff Derrick V Cole"), (US Treasury/SSA), and the (IRS)
3 during the years of 2009, 2010, 2011, 2012 totaling the amount of \$6,626.00 dollars.
4

5 9) ("Plaintiff Derrick V Cole") received a collection notice from (Allied Interstate
6 L.L.C) the (Collection Agency) on behalf the Defendant (ECMC -Education Credit
7 Management Corporation). This notice is dated September 17, 2016 (Exhibit (B)).
8

9 10) It states that (Plaintiff Cole) has a balance of \$4,817.00 for the debt that has
10 been previously paid. (Plaintiff Cole) contacted (ECMC -Education Credit
11 Management Corporation) and found out their office received (IRS) funds from a
12 fraudulent tax return year filed under the name of (Plaintiff Cole) therein the funds
13 collected by (ECMC - Education Credit Management Corporation) from the (IRS)
14 where funds from tax fraud. The Defendants had to return the (IRS) funds of fraud
15 they participated in.
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19 11) During the time this Defendant ECMC was garnishing the disability wages of
20 (Plaintiff Cole) they went after (IRS) money that was obtained by fraud. (Plaintiff
21 Cole) gave full disclosure of his financial status during a loan rehabilitation period
22 with (ECMC). They had knowledge that (Plaintiff Cole) was disabled and still is and
23 no taxes to collect because he has not worked in years because of the disability.
24
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26 12) ("Plaintiff Cole") believes Defendants (Allied Interstate L.L.C) and (ECMC -
27 Education Credit Management Corporation") violated Title 15 U.S.C.A §1692(f)
28 Unfair Practice.

1 As a result of ECMC's negligent business practices they have placed (Plaintiff
2 Cole) back into collections and defaulted him on his student loan status. (Plaintiff
3 Cole will be thrown out of school and prevent from receiving grants, loans or
4 scholarships. ECMC is doing this to fix the wrongful business practices that (ECMC)
5 engaged in which has put ("Plaintiff Cole") in this financial damaging position and
6 cover the (Corporation) for their bad accounting practices.
7
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9 13) As a proximate result of (Plaintiff Cole's) damages it is the reckless conduct
10 enacted by the Defendants (ALLIED INTERSTATE LLC) the (Collection Agency)
11 and the (Original Creditor) (EDUCATIONAL CREDIT MANAGEMENT
12 CORPORATION) who are making financial demands for payments on accounts that
13 have already been paid. (Plaintiff Derrick V Cole) is suffering financial damage from
14 the reckless disregard of (ECMC) by their office placing (Plaintiff Cole's) paid
15 account in a ("Collection Agency") for a new payment demand because of their
16 negligence in accounting practices and involving their selves in IRS fraud.
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20 If (Plaintiff Cole) has to pay this debt again it will cause more ("intentional
21 inflection of emotional distress") he is experiencing now. (Plaintiff Cole) is nervous
22 on a daily bases because he does not know if (ECMC) is planning to ruin his life again
23 with another garnishment on his (Social Security Benefits) causing him to be thrown
24 out of his home, food, car, clothing, medicine and education.
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1 14) As a further proximate result of damage (ECMC Corporation) will not consider
 2 any of the funds they have in their possession from garnishments and payments. If the
 3 (Defendants) do not have any records of (Plaintiff's Cole's) payments that proves
 4 either embezzlement, accounting fraud, and or extortion is taking place.

6 ("Plaintiff Derrick V. Cole") declares that if he has to repay this bill again it will
 7 cause financial damage causing him to lose his home, car, clothing, and medicine.

9 15) ("Plaintiff Derrick V Cole") alleges this ("Corporation") ("ECMC") negligence,
 10 mistakes, and corruption are facts to this cause of action pursuant to Title 15 U.S.C.A
 11 Code §1692(F) Unfair Practices. ("Plaintiff Cole") alleges the Defendants financial
 12 demand for a new payment is fraudulent and unfair business practices.

14 ("EDUCATIONAL CREDIT MANAGEMENT CORPORATION") is the direct and
 15 proximate cause of (Plaintiff Cole's) material allegations and material facts of
 16 ("Intentional Inflection Of Emotional Distress") caused by (ECMC) and (Allied
 17 Interstate LLC)'s (Unfair Practices) under the (Fair Debt Collection Practice Act).

19 (Plaintiff Cole) is requesting financial compensation for (General and Special)
 20 damages in amount according to proof submitted to this court in a statement of
 21 damages. Plaintiff request trial by judge and reserves the right for a jury.

23 **DEFENDANT TWO (2)**

26 **STATEMENT OF FACTS AND CAUSE OF ACTION FOR THE DEFENDANTS**
 27 **(DBA) doing business as SOUTHERN CALIFORNIA EDISON CORPORATION**
 28 **REPORTING OBSOLETE CREDIT INFORMATION**
TITLE 15 USCA §1681C (A) (4)

1 16) ("Plaintiff Derrick Vernon Cole") is ignorant of true names of this corporation
2 and it's capacities of this Defendant (DBA) (SOUTHERN CALIFORNIA EDISON
3 CORPORATION) who represents its own corporation and Does 16 through 21 in this
4 ("Civil Complaint"). This corporation's fictitious name is listed in caption and sued in
5 this ("Civil Complaint") under their Corporation name.
6

7
8 17) (Plaintiff Derrick Vernon Cole) will amend this ("Civil Complaint") and allege
9 the true names of any unknown ("Defendant") in his or her own capacity when that
10 information is ascertained and filed in accordance with Federal Civil pleading
11 procedures.
12

13 18) ("Plaintiff Derrick V Cole") alleges and at all times mentions the material
14 allegations that this Defendant (Edison Electric Corporation) has refused to remove an
15 account that was placed for collections in 2009. This is an electrical utility business
16 account for a house that was a board and care home in San Bernardino, California.
17

18 Ten (10) other house accounts were attached to (Plaintiff Cole's) name taking the
19 bill from \$300.00 to \$2,500.00. The Defendants collected \$600.00 from (Plaintiff
20 Cole) and then cut his electricity off and put (Plaintiff Cole) out of business and told
21 him that "You can't do anything to the power company, we can do what they want
22 we have enough money and stop calling to have lights cut on, pay your bill"
23

24 19) ("Plaintiff Derrick V. Cole") lost his entire business furniture, clothing, and
25 finances. This utility company had specific and direct knowledge these accounts
26 we're not (Plaintiff Cole's) because another party by the name of (Pensri Dalton) is
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1 paying this account as of today. This account was reported to all three credit reporting
2 agencies, and caused (Plaintiff Cole) seven years of financial damage.

3 20) As a proximate result of the Defendants conduct (Plaintiff Cole) lost his
4 livelihood from 2009 to 2012. As a disabled person (Plaintiff Cole) was not able to
5 have a house, car, clothing and medicine or obtain credit to get an education because
6 of this Defendant's negligent credit reporting. This Defendant (Edison Electric
7 Corporation's) negligence and careless disregard to (Plaintiff Cole's) Fair Credit
8 Report Rights and Title 15 USCA §1681c (a) (4) Reporting Obsolete Credit
9 Information, caused (Plaintiff Cole) unwanted damage to his financial wellbeing and
10 done so in a concise disregard to the request of leniency (Plaintiff Cole) was told "too
11 bad".

12 21) (Plaintiff Cole) ask this court is issue a judgement against this Defendant for
13 (General and Special) damages caused by Edison Electric Co who is the direct and
14 proximate cause of (Plaintiff Cole's") allegations and material facts of ("Intentional
15 Inflection Of Emotional Distress") caused by their reporting of obsolete information
16 (Plaintiff Cole) is requesting financial compensation for (General and Specific)
17 Damages in amount according to proof submitted to this court in a statement of
18 damages. Plaintiff request Trial by Judge and reserves the right for Jury Trial.

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26 **DEFENDANT (3)**

27 **STATEMENT OF FACTS AND CAUSE OF ACTION FOR THE DEFENDANTS**
28 **AD ASTRA RECOVERY SERVICES & SPEEDY CASH**
TITLE 15 USCA §1692(F) UNFAIR PRACTICES

1 22) ("Plaintiff Derrick Vernon Cole") is ignorant of true names of these businesses
2 and their capacities the Defendant (DBA) (AD ASTRA RECOVERY SERVICE) who
3 represents the (Original Creditor) (SPEEDY CASH) and these Defendants Does 22
4 through 26 in this ("Civil Complaint").
5

6 23) The Defendants business fictitious names and their associate's fictitious name
7 listed in caption are sued in this ("Civil Complaint"). ("Plaintiff Derrick V Cole") will
8 amend this ("Civil Complaint") and allege the true names of unknown (Defendants)
9 or (Associates) and their true names in his or her own capacity when that information
10 is ascertained and filed in accordance with Federal Civil pleading procedures.
11

12 24) The Defendants have caused (Plaintiff Cole) an unnecessary hardship when they
13 refused to allow (Plaintiff Cole) to pay the account without interest or 25% interest
14 within 30 days of the cash loan. (Plaintiff Cole) alleges that the loan for \$175.00 was
15 made with the Defendant (Speedy Cash) on May 28, 2010. On June 2, 2010 he
16 contacted the Defendant to explain that his wages were being garnished and his
17 business was being closed down by (Edison). (Plaintiff Cole) was told "That's too
18 bad you going through a wage garnishment this but we cannot make any exceptions
19 you either pay us \$300.00 back on the \$175.00 loan or go to collections".
20

21 25) As a proximate result of the Defendants conduct (Plaintiff Cole's) offers to
22 resolve this debt was denied on two different occasions, and the third attempt
23 (Plaintiff Cole) was told that he was sent to collections.
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1 The (Collection Agency) (AD ASTRA RECOVERY SERVICE) continued the same
2 practice and reported the debt to all credit reporting agencies.

3 26) The damage caused by these Defendants is the reporting of this debt which
4 prevented (Plaintiff Cole) from having a home, car, education food clothing and
5 medicine. (Plaintiff Cole) alleges the Defendants (SPEEDY CASH) & (AD ASTRA
6 RECOVERY SERVICE) refusal to accept a payment arrangement is unfair and
7 unconscionable and done deliberately to force money out of (Plaintiff Cole) the
8 Defendants knew he did not have.

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12 Thereof, (Plaintiff Cole) contends Title 15 USCA §1692(f) Unfair Practice, was
13 violated against his person and the Defendants should pay for (General Damages)
14 alleged in this complaint all in amount according to proof made before this
15 Federal District court. (Plaintiff Cole) request trial by Judge and reserves the right for
16 a Trial by Jury.

17 **DEFENDANT (4)**

18 **STATEMENT OF FACTS AND CAUSE OF ACTION FOR THE DEFENDANTS** 19 **(DBA) doing business as I.C. SYSTEMS & COX COMMUNICATIONS** 20 **TITLE 15 USCA §1692(F) UNFAIR PRACTICES**

21 27) ("Plaintiff Derrick Vernon Cole") is ignorant of true names of these businesses
22 and their capacities of this Defendant doing business as (I.C SYSTEMS and COX
23 COMMUNICATIONS). These Defendants Does 27 through 32 in this ("Civil
24 Complaint"). These businesses fictitious names and their associate's fictitious names
25 are listed in caption and are sued in this ("Civil Complaint) for damages.
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1 28) (Plaintiff Derrick Vernon Cole) will amend this ("Civil Complaint") and allege
2 the true names of any unknown (Defendant(s) or (Associate(s) and their true names
3 in his or her own capacity when that information is ascertained and filed in
4 accordance with Federal Civil pleading procedures.
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6 29) (Plaintiff Derrick V Cole) had a very unpleasant customer service experience
7 with the Defendants (Cox Communication) who at all times mentioned is the utility
8 company who over charged (Plaintiff Cole). (Plaintiff Cole's) service account was for
9 a home phone and basic cable television. (Plaintiff Cole) has account statements in the
10 amount of \$500.00 plus dollars showing auto debiting done by the Defendants on
11 ("Plaintiff Cole's) Nevada State bank account which was closed due to the (Cox
12 Communications) collection's department @702-383-50540. This office told
13 (Plaintiff Cole) "It is your fault your account is over drawn you should have had the
14 money in the account to pay your bill". Then the phone was slammed and (Plaintiff
15 Cole) was cut off.
16

17 30) (Plaintiff Cole) sent the local office an informal notice to sue then ten days later
18 a revised billing statement was issued after the billing error was discovered. (Plaintiff
19 Cole) has explained to the Defendants that they are responsible for the overdraft fees
20 caused to (Plaintiff Cole's) checking account in the amount of \$130.00. Also the
21 Defendants have turned (Plaintiff Cole's) service account over to a (Collection
22 Agency) and reported the service account as unpaid to all credit reporting agencies
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1 and they refused to resolve the (Dispute) before reporting.

2 31) As a proximate result of the Defendants (Negligence and Abuse) of billing
3 practices (Plaintiff Cole) has suffered damage to his financial livelihood.
4

5 32) Thereof, (Plaintiff Cole) contends Title 15 USCA §1692(f) Unfair Practices was
6 violated against his person and the Defendants the (Collection Agency) (I.C Systems)
7 and (Cox Communications) should pay for the material damages and general damages
8 as alleged in this civil complaint all in amount according to proof and evidence
9 submitted to this Federal District court. (Plaintiff Cole) request a trial by Judge and
10 reserves the right for a Jury Trial.
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13 **DEFENDANT (5)**

14 **STATEMENT OF FACTS AND CAUSE OF ACTION FOR THE DEFENDANTS** 15 **(DBA) ALLIED COLLECTION SERVICE & DR. EDWIN ADOLFO MD** 16 **TITLE 15 USCA §1692(F) UNFAIR PRACTICES AND** 17 **TITLE 15 USCA §1681C (A) (4) REPORTING OBSOLETE** 18 **CREDIT NFORMATION**

19 33) ("Plaintiff Derrick Vernon Cole") is ignorant of true names of these businesses
20 and their capacities of each Defendant (DBA) (ALLIED COLLECTION SERVICE)
21 who represents the (Original Creditor DR.EDWIN ADOLFO M.D) and these
22 Defendants Does 33 through 36, in this (Civil Complaint). These businesses fictitious
23 names and their associates fictitious names are listed in caption in this ("Civil
24 Complaint") and are sued under those names.
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27 34) (Plaintiff Derrick Vernon Cole) will amend this ("Civil Complaint") and allege
28 the true names of any unknown (Defendant(s) or (Associate(s) and their true names in

1 his or her own capacity when that information is ascertained and filed in accordance
2 with Federal Civil pleading procedures.

3 35) These Defendants started financial damage with a \$35.00 dollar bill that was
4 missed by (Plaintiff Cole's) insurance. The Defendant started off with sending this
5 bill to a Collection Agency). When (Plaintiff Cole) received the notice from the
6 (Collection Agency) he told them to rebill his insurance. The Doctors billing office
7 stated they are only going to bill one time because the amount was so small. After that
8 (Plaintiff Cole's) medical account was sent to collections. The Defendants filed this
9 medical debt of (Plaintiff Cole's) with all credit reporting agencies causing financial
10 damage to (Plaintiff Cole's) ability to use his credit to have a home.
11

12 Since the reporting of this small debt the damage has been done (Plaintiff Cole) has
13 not been able to obtain a house, car, food, clothing and medicine as a result of this
14 Defendants conduct of sending a \$35.00 dollar bill to collections and reporting this
15 medical bill to all credit reporting agencies.
16

17 36) (Plaintiff Cole) contends Title 15 USCA §1692(f) Unfair Practices And Title 15
18 USCA §1681c (a) (4) Reporting Obsolete Credit Information was violated against his
19 person and the Defendants the (Collection Agency) (Allied Collection Service) and
20 the (Original Creditor Dr. Erwin Adolfo M.D.) should pay for the damages alleged in
21 this complaint all in amount according to proof and evidence submitted to this Federal
22 District court.
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DEFENDANT (6)**STATEMENT OF FACTS AND CAUSE OF ACTION FOR THE DEFENDANTS
(DBA) FINANCIAL CREDIT NETWORK & SOUTHERN CALIFORNIA GAS
TITLE 15 USCA §1692(F) UNFAIR PRACTICES AND
TITLE 15 USCA §1681C (A) (4) REPORTING OBSOLETE
CREDIT INFORMATION**

37) ("Plaintiff Derrick Vernon Cole") is ignorant of true names of these businesses and their capacities. The Defendants DBA (FINANCIAL CREDIT NETWORK) who represents the (Original Creditor SOUTHERN CALIFORNIA GAS) these Defendants Does 37 through 42, in this (Civil Complaint). These businesses fictitious names and their associate's fictitious names listed in caption are sued in this ("Civil Complaint").

38) (Plaintiff Derrick Vernon Cole) will amend this ("Civil Complaint") and allege the true names of any unknown ("Defendant(s) or ("Associate(s) and their true names in his or her own capacity when that information is ascertained and filed in accordance with Federal Civil pleading procedures.

39) The (Original Creditor Southern California Gas) would not accept (Plaintiff Cole's) payment arrangement of \$30.00 a month. On August 16th 2010 that Monday when (Plaintiff Cole) contacted customer service the Defendant refused to except the arrangement and stated this account is 6 months old and is going to a (Collection Agency) if not paid in full. (Plaintiff Cole) explained that he was put out of business and had no way to pay in full.

40) The (Original Creditor Southern California Gas) and the (Collection Agency Financial Credit Network) has reported this utility debt to all credit reporting agencies

1 that is seven years old. Hereof, these Defendants keep renewing the debt with the
2 credit reporting agency's without communicating with the (Plaintiff) in order to
3 determine the validity of the debt, or allowing the (Plaintiff) to resolve based on his
4 ability to pay.

5
6 41) As a proximate result of these Defendants conduct (Plaintiff Cole) does not have
7 any material knowledge of the actual debts balance, nor does he have a billing
8 statement as to the current amount. \$225.74 was the previous amount and if it has
9 changed (Plaintiff Cole) does not have any material knowledge of that accounting.
10 (Plaintiff Cole) alleges the utility account is not reported accurately and should be
11 removed from all of (Plaintiff Cole's) credit reports.
12

13
14 42) The Defendants have refused to accept the (Plaintiff) payment arrangement to
15 resolve the debt. (Plaintiff Cole) contends Title 15 §1681 Reporting Obsolete Credit
16 Information was violated against his person and the Defendants should pay for the
17 damages caused by distributing information that was not accurate and caused
18 (Plaintiff Cole) financial damage where he could not obtain a home, clothing, car, and
19 medicine. (Plaintiff Cole) is requesting damages for the material allegations in this
20 Complaint all in amount according to proof made and placed before this Federal
21 District court. (Plaintiff Cole) requests a Trial by Judge and reserves the right for a
22 Trial by Jury.
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PRAYER FOR RELIEF

1 1) Plaintiff ("Derrick V Cole") request this Federal District court to issue a
 2 (Judgement) against the Defendants ALLIED INTERSTATE LLC &
 3 EDUCATIONAL CREDIT MANAGEMENT CORPORATION for the material
 4 damage alleged in 1 through 15 paragraphs caused to Plaintiff Cole's person and
 5 credit stated in the cause of action and any other (General or Special) damages the
 6 court finds reasonable all in amount according to proof.

7 2) Plaintiff ("Derrick V Cole") request this Federal District court to issue a
 8 (Judgement) against the Defendants SOUTHERN CALIFORNIA EDISON
 9 CORPORATION for the material damage alleged in paragraphs 16 through 21 caused
 10 to Plaintiff Cole's person and credit stated in the cause of action and any other
 11 (General or Special) damages the court finds reasonable all in amount according to
 12 proof.

13 3) Plaintiff ("Derrick V Cole") request this Federal District court to issue a
 14 (Judgement) against the Defendants AD ASTRA RECOVERY SERVICES &
 15 SPEEDY CASH for the material damage alleged in paragraphs 22 through 26 caused
 16 to Plaintiff Cole's person and credit stated in the cause of action and any other
 17 (General or Special) damages the court finds reasonable all in amount according to
 18 proof.

19 4) Plaintiff ("Derrick V Cole") request this Federal District court to issue a
 20 (Judgement) against the Defendants I.C. SYSTEMS & COX COMMUNICATIONS
 21 for the material damage alleged in paragraphs 27 through 32 caused to Plaintiff Cole's
 22 person and credit stated in the cause of action and any other (General or Special)
 23 damages the court finds reasonable all in amount according to proof.

24 5) Plaintiff ("Derrick V Cole") request this Federal District court to issue a
 25 (Judgement) against the Defendants ALLIED COLLECTION SERVICE & DR.
 26 EDWIN ADOLFO MD for the material damage alleged in paragraphs 33 through 36
 27 all caused to Plaintiff Cole's person and credit stated in the cause of action and any
 28 other (General or Special) damages the court finds reasonable all in amount according
 to proof.

6) Plaintiff ("Derrick V Cole") request this Federal District court to issue a
 (Judgement) against the Defendants FINANCIAL CREDIT NETWORK
& SOUTHERN CALIFORNIA GAS for the material damage alleged in paragraphs 37
 through 42 caused to Plaintiff Cole's person and credit stated in the cause of action
 and any other (General or Special) damages the court finds reasonable all in amount
 according to proof.

Verification And Declaration

1 Plaintiff Derrick Vernon Cole, declares that he is a United States citizen and the
2
3 Defendants are in the United States as described by their address. Plaintiff Cole claims
4 are made and based on material evidence that will be used in this court. (Plaintiff
5
6 Cole) in one way or another came into contact with the companies mentioned in this
7
8 Complaint, while Derrick V Cole lived in Clark County.

9 Derrick V Cole, suffered damages in Clark County and in California as a result of
10
11 all Defendants listed in caption in this complaint.

12 Derrick Vernon Cole declares that each and every statement alleged in this
13
14 complaint is true and correct to the best of my knowledge belief and understanding
15
16 pursuant to the United States Code and Rules Of This Court.

17 10-25-16

18 Date

19 

20 DERRICK VERNON COLE
21 IS IN PRO PER
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